

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CLEBERSON QUADRELLI and)
ABDY NIZEYIMANA, on behalf of)
themselves and all others similarly situated,)
Petitioners,) C.A. No. 20-10685-ADB
v.)
ANTONE MONIZ, Superintendent of the)
Plymouth County Correctional Facility,)
Respondent.)

)

MOTION FOR EXPEDITED BAIL HEARINGS FOR CLASS MEMBERS

Petitioners hereby move for an order scheduling expedited bail hearings on behalf of themselves and the certified class of civil immigration detainees now held by Respondent at the Plymouth County Correctional Facility. While the merits of the case develop (including through the discovery process), the Court possesses the inherent power to grant bail to protect the rights of class members. As grounds for this motion, Petitioners rely on the accompanying memorandum of law. Petitioners request that the Court order the government to file an expedited opposition.

June 12, 2020

Respectfully submitted,

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LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I conferred with opposing counsel in a good faith attempt to narrow or resolve the issues raised in this motion. Counsel for the Respondent opposes the motion.

/s/ Laura K. McCready
Laura K. McCready